

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Danny O'Neill Dobbs

DOB: 1967

Citizenship: USA

Case No. 7:19-MJ-381

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 18, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 USC § 952

## Offense Description

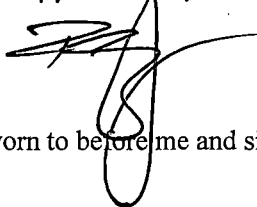
Illegal Importation of a Controlled Substance / Approximately 389.8 Grams of Alprazolam a Schedule IV Controlled Substance, Approximately 593.3 Grams of Carisoprodol a Schedule IV Controlled Substance, and Approximately 169.9 Grams of Oxycodone a Schedule IV Controlled Substance

This criminal complaint is based on these facts:

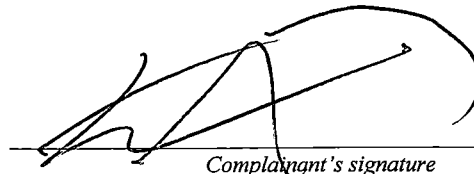
See Attachment "A"

☒ Continued on the attached sheet.

Approved by



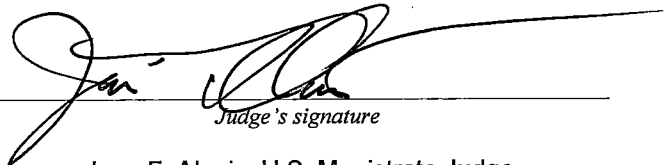
Sworn to before me and signed in my presence.

Date: 02/19/2019 - 8:54 a.m.City and state: McAllen, Texas

Complainant's signature

Eddie A. Ramirez, HSI Special Agent

Printed name and title



Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT A**

I am a Special Agent (SA) of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On February 18, 2019, Danny O'Neill DOBBS and Latonya HEARD entered the United States on foot through the Progreso, Texas Port of Entry.
2. At the Progreso Port of Entry, DOBBS and HEARD gave negative declarations for narcotics, weapons, ammunition and monetary instruments in excess of \$10,000 to Customs and Border Protection (CBP) officers.
3. DOBBS and HEARD stated they travelled to Mexico from San Antonio, Texas to go shopping for the afternoon, both individuals are United States Citizens.
4. DOBBS and HEARD were referred for a secondary inspection. During the secondary inspection, boxes containing pills that were labeled Alprazolam, Carisoprodol, and Oxycodone were found concealed within boxes of cookies that both DOBBS and HEARD had in their possession upon crossing from Mexico into the United States.
5. Further inspection resulted in the discovery of a total of 1,500 dosage units of Alprazolam, 1,150 dosage units of Carisoprodol, and 615 dosage units of Oxycodone. The dosage units of the controlled substances infers distribution.
6. Neither DOBBS nor HEARD possess licenses, prescriptions, or a DEA registration number authorizing them to possess or import the concealed narcotics.
7. HSI SAs, advised DOBBS of his Miranda warnings in the English language, which he stated he understood and waived in writing.
8. After waiving his Miranda rights, DOBBS stated he picked up packages at an undisclosed pharmacy in Mexico. DOBBS stated he thought that a controlled substance used to make methamphetamine was concealed in the boxes.
9. DOBBS instructed HEARD to carry some of the bags from Mexico to the United States.
10. HSI Special Agents placed DOBBS under arrest for violation of 21 United States Code 952.